

September 24, 2018
 Statement of Attorneys Fees
 FLA004 - 79233
 CO: GMS Excavators Inc

4/4/2018	JJB	Review supplemental answers to our discovery; Draft correspondence to Atty. J. Lessner; Office conference with YH	0.80 hrs
4/5/2018	YH	Prepare declarations on computation of withdrawal liability.	4.00 hrs
4/6/2018	YH	Prepare declarations on computation of withdrawal liability; research summary judgment brief.	4.20 hrs
4/9/2018	JJB	Review correspondence between YH and D. Ciner; Office conferences with YH; Draft correspondence to Atty. J. Lessner re: supplemental discovery responses	4.00 hrs
4/9/2018	YH	Research and draft summary judgment brief.	4.80 hrs
4/10/2018	JJB	Review draft of summary judgment brief and affidavits	1.00 hrs
4/10/2018	YH	Review GMS supplemental discovery responses.	0.20 hrs
4/11/2018	JJB	Office conference with YH; Review correspondence from Atty. D. Lessner with additional discovery	0.50 hrs
4/12/2018	JJB	Review, revise and edit summary judgment brief; review case law	1.70 hrs
4/13/2018	JJB	Office conference with YH re: brief; Draft correspondence to T. Suber re: additional discovery; review Suber response	4.00 hrs
4/16/2018	JJB	Legal research on issue of arbitration	1.50 hrs
4/17/2018	YH	Draft proposed findings of fact.	0.80 hrs
4/19/2018	JJB	Office conference with YH; review Ciner affidavit; Review correspondence from Court	0.75 hrs
4/19/2018	YH	Prepare proposed findings of fact; edit summary judgment materials.	1.90 hrs
4/20/2018	JJB	Review final summary judgment brief; Review correspondence from T. Suber	1.20 hrs
4/30/2018	JJB	Review correspondence from T. Suber; review additional document production; Office conferences with CJA, CMW; Draft correspondence to Atty. J. Lessner	0.80 hrs
5/10/2018	JJB	Review correspondence from Court confirming filings	0.20 hrs

5/11/2018	YH	Review GMS opposition brief; research law on continued employer status v. mere employer status.	4.40 hrs
5/15/2018	YH	Research and draft reply brief.	5.30 hrs
5/16/2018	YH	Research and draft reply brief supporting summary judgment.	1.60 hrs
5/17/2018	YH	Review and edit reply brief; draft Schmidt declaration; draft replies and responses on proposed findings of fact.	5.10 hrs
5/17/2018	JJB	Review and edit summary judgment reply brief and Rule 11 motion	1.00 hrs
5/18/2018	YH	Draft responses to proposed findings of fact.	0.20 hrs
5/18/2018	JJB	Review Schmitt declaration; Telephone conferences with J. Schmitt; Office conferences with YH; further editing of brief and declaration	1.50 hrs
5/21/2018	YH	Edit and file reply materials supporting summary judgment.	1.50 hrs
5/21/2018	JJB	Review all filings including Declarations; review Rule 10 brief and notice to defendant	1.70 hrs
5/21/2018	YH	Edit and file reply brief and Rule 11 motion.	2.00 hrs
6/13/2018	YH	Review, discuss with Schmidt Schumaker email.	0.30 hrs
6/14/2018	CJA	Review correspondence from J. Schmitt enclosing e-mail from M. Shumaker (GMS); Telephone conference with J. Schmitt and YH regarding same; Office conference with Attorney J. Brennan	0.50 hrs
6/21/2018	JJB	Office conference with CJA; Review correspondence from M. Shumaker to J. Schmitt; Telephone conference with J. Schmitt	0.50 hrs
6/21/2018	CJA	Review correspondence from J. Schmitt enclosing Correspondence from M. Shumaker (GMS); Telephone conference with J. Schmitt regarding same; Office conference with Attorney J. Brennan	0.70 hrs
6/27/2018	JJB	Review correspondence from Court re: defendant's response	0.30 hrs
6/28/2018	CJA	Office conference with YH	0.20 hrs
6/29/2018	JJB	Review Defendant's brief in opposition to Rule 11 Sanctions	0.80 hrs
6/29/2018	YH	Research and draft reply brief for sanctions.	2.50 hrs
7/2/2018	YH	Research and draft reply brief on motion for sanctions.	2.50 hrs
7/5/2018	YH	Draft and file reply brief in support of motion for sanctions.	1.50 hrs
7/6/2018	JJB	Review reply brief of plaintiffs on Rule 11 Motion; Office conference with YH	1.50 hrs

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8/28/2018	JJB	Review Scheduling Order and attachments; Office conference with CJA	1.00 hrs
8/29/2018	PET	Began reviewing pretrial order. Office conference with JJB. Began drafting Rule 26(a)(3) disclosures.	4.10 hrs
8/29/2018	JJB	Office conferences with CJA, PET; review federal rules; review local rules on joint pretrial statement and related submissions; compile checklist	1.60 hrs
8/30/2018	JJB	Analyze necessary exhibits and witnesses for pretrial statement; determine necessary facts; determine issues of law for special verdict form; Office conferences with PET	2.50 hrs.
8/30/2018	PET	Began reviewing file and summary judgment pleadings. Began drafting pretrial submission pleadings. Office conference with Attorney J. Brennan.	5.10 hrs
8/31/2018	PET	Continued reviewing pleadings and drafting pretrial submission pleadings. Meetings with Attorney J. Brennan reviewing/discussing pleadings.	6.80 hrs
8/31/2018	JJB	Office conference with PET; review and discuss PET's drafts of plaintiff's pretrial statement, special verdict form, exhibit and witness lists	2.00 hrs
9/6/2018	JJB	Review YH Joint Pretrial Report; Review correspondence from atty. J. Lessner; review proposed undisputed facts; Office conferences with YH	2.00 hrs
9/7/2018	JJB	Review, revise and proof final pretrial submissions to Court	1.30 hrs
			Total Hours <u>85.35</u>
			Total Attorney Fees <u>\$15,363.00</u>